

22 July 2021

Your Reference: MBN21/440  
Our Ref: AC:ljc (A5546907)  
Contact: Office of the Chief Executive Officer  
Telephone Number: (07) 3829-8860

The Honourable Steven Miles MP  
Deputy Premier  
Minister for State Development, Infrastructure,  
Local Government and Planning  
PO Box 15009  
City East Queensland 4002  
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Dear Deputy Premier

I refer to your recent correspondence to Redland City Council dated 24 June 2021 regarding your intention to issue Council with a Ministerial Direction to prepare a housing supply and diversity strategy (the strategy).

I am writing to advise that at its General Meeting on the 21 July 2021, Council resolved to respond by providing written representations for you to consider in deciding whether or not to proceed with the proposed direction. A copy of the Council report is enclosed for your information.

In summary, Council's representations, as outlined below, highlight how the City is meeting its *ShapingSEQ* dwelling supply benchmarks and delivering housing diversity. On this basis Council does not believe there is any demonstrated need or justification to require the preparation of a housing supply and diversity strategy at this time.

Moreover, Council considers the delivery of key State transport and other infrastructure is a much higher priority in addressing the ongoing housing supply and diversity needs of the City. In this regard it is noted the 2020 Land Supply and Development Monitoring (LSDM) report specifically acknowledges that realisation of the significant capacity of planned dwelling supply in the Redlands consolidation area would be supported by the provision of 'key region-shaping' infrastructure. This includes the Eastern Busway extension to Capalaba and the Cleveland Rail duplication through to Cleveland.

For these above reasons, Council at its General Meeting also resolved to request that the State Government provide a transport and infrastructure plan that is intrinsically linked to the dwelling forecasts for Redland City, including the Eastern Busway through to Capalaba, Cleveland Rail duplication to Cleveland and upgrades to all State-owned roads.

The following representations are provided for your consideration in deciding whether to proceed with the proposed Ministerial Direction:

1. The Redland City Plan was informed by the Redland Housing Strategy 2011-2031 which has provided an evidence based framework to ensure the delivery of appropriate residential supply and housing diversity in City Plan and subsequent ongoing amendments.

1...2.

2. The State Government's recent 2020 LSDM Report found that the City has sufficient residential land supply to meet the dwelling supply benchmarks of the *ShapingSEQ*, including the minimum 15 year supply and to 2041.
3. It is expected, based on recent lot approval analysis, that the short term shortfall of approved lots in the City will be addressed in the next LSDM report. In particular, information recently provided to the Growth Areas Team (GAT) demonstrates that for the 2020/2021 financial year the approved residential lot supply in the City has increased and is expected to well exceed the four years of supply as identified in *ShapingSEQ* as a measure that matters and the LSDM report.
4. The LSDM report shows that many of the other SEQ local governments also do not currently meet the minimum four years supply of approved lots, this includes Brisbane, Gold Coast, Moreton Bay, Sunshine Coast and Noosa. Council understands that these other local government areas have not been directed to undertake a housing supply and diversity strategy.
5. Council has significantly progressed land use and infrastructure planning for two newly emerging communities in South West Victoria Point and Southern Redland Bay (Shoreline), with reconfiguration approvals already in place. Once completed both master planned areas are expected to accommodate well over 5000 newly created lots comprising of a mix of lot sizes including small lots below 400m<sup>2</sup> in size.

In this regard it is noted recent reconfiguration approvals issued by Council for the Shoreline development show 138 of the 465 approved lots (or 30%) have a minimum lot size less than 400m<sup>2</sup>. In addition, a further 454 residential lots with a mix of lot sizes, including lots less than 400m<sup>2</sup> have recently been approved by the Planning and Environment Court within the South west Victoria Point local plan area (Planning and Environment Court References 3829/2019 and 566/2020).

In regards to Southern Redland Bay and its recent designation as a priority growth area, it is also noted the recent Ministerial press release dated 25 June 2021 acknowledged the Southern Redland Bay project 'will unlock growth, housing choice and affordability, as part of Queensland's COVID-19 Economic Recovery Plan'. The press release further acknowledged that in addition to the currently approved Shoreline development, 'the infrastructure funding will also unlock an additional 2000 lots outside the master planned community'. If successfully progressed by the State, the development of the Southern Redland Bay priority growth area is expected to provide more dwellings by 2041 than required to be provided within the expansion area of Redland City as identified in the SEQ *ShapingSEQ* dwelling supply benchmarks. By providing a mix of lot sizes and dwelling types the development of the Southern Redland Bay priority growth area will play a significant role in addressing housing choice and diversity across the whole City.

6. Council has recently engaged independent consultants PIE Solutions to undertake a detailed residential land supply study that will inform land use and infrastructure planning. This study will be used to provide an evidence base for the new Local Government Infrastructure Plan and Netserv Plan. It is also expected to support future City Plan amendments. It is expected the report will be finalised by the end of July 2021.
7. The amendments conditioned by the former planning Minister in approving the City Plan to provide qualifying statements to minimum lots sizes in the Low density residential and Low medium density residential zone provide scope for small lots less than 400m<sup>2</sup>.
8. Major Amendment Package (04/20): Medium density residential zone code review proposes amendments to both the Low medium density and Medium density residential zone code. The amendment, once finalised, is expected to deliver significant improvements in the design and built form outcomes being delivered by multiple dwelling development resulting in greater community acceptance of this important housing typology. The amendment will also deliver greater multiple dwelling diversity by requiring new proposals to incorporate a mix of dwelling units with different numbers of bedrooms and provide new opportunities for the delivery of freehold titled townhouse development on lots that may be significantly less than 400m<sup>2</sup>.

9. The 2020 LSDM report identifies that the City has more than seven years supply of uncompleted multiple dwellings, which is well above the minimum four years' supply identified in *ShapingSEQ* and the LSDM report. The 2020 LSDM report also identifies that when compared to dwelling stock at the 2016 Census, recent dwelling approvals in Redland indicate an increase in housing diversity. As noted earlier in this correspondence, the LSDM report also identifies that across the Redland consolidation area, the capacity of planned dwelling supply, from 2016 onwards, is about 38,500 dwellings. This is significantly above the consolidation 2041 dwelling supply benchmark of 12,500 dwellings. The LSDM report also notes that realisation of this significant capacity of planned dwelling supply would be supported by the provision of 'key region-shaping' infrastructure including the Eastern Busway extension to Carindale and Capalaba and the Cleveland Rail duplication through to Cleveland.

The above highlights the planning being undertaken by Council to meet its regional planning dwelling supply benchmarks and delivering improved housing diversity, which will assist with improving housing choice and affordability in the Redlands to meet the housing needs of the community.

While Council recognises the value in preparing a housing supply strategy to inform long-term strategic planning, it is not considered to be an urgent priority and should instead be undertaken as part of the next City Plan review process.

Council's current long term strategic planning work program identifies that a new housing strategy would be prepared in 2024 as a key input to the review and preparation of a new City Plan, expected to commence in 2025.

In addition, it is noted, that if you decide to make the proposed direction as set out in your correspondence of 24 June 2021, Council will initially be required (within 40 business days) to submit a project management plan for the strategy to the State Planner for approval and that when completed Council is required to provide the strategy for Ministerial approval.

Council is not satisfied that the *Planning Act 2016* or the Ministers Guidelines and Rules require, or provide for, this level of State Government oversight and approval for planning projects that may or may not result in an amendment to a local planning instrument.

Some flexibility to revise the final August 2022 timeframe should also be provided if the strategy is to address any changes made to the State Planning Policy or *ShapingSEQ* while the strategy is being prepared.

Should you have any questions in relation to this matter, I invite your Department to contact Mr David Jeanes, Group Manager City Planning and Assessment on telephone number (07) 3829-8112 or email [david.jeanes@redland.qld.gov.au](mailto:david.jeanes@redland.qld.gov.au).

Yours sincerely



Andrew Chesterman  
**Chief Executive Officer**  
**Redland City Council**

*Encl.*

*c.c Mayor Karen Williams*

## 14 REPORTS FROM COMMUNITY & CUSTOMER SERVICES

### 14.1 NOTICE OF MINISTERIAL DIRECTION TO PREPARE A REDLAND CITY HOUSING SUPPLY AND DIVERSITY STRATEGY

**Objective Reference:** A5508996

**Authorising Officer:** Louise Rusan, General Manager Community & Customer Services

**Responsible Officer:** David Jeanes, Group Manager City Planning and Assessment

**Report Author:** Michael Beekhuyzen, Principal Strategic Planner

**Attachments:** 1. Notice of Ministerial Direction and draft Ministerial Direction [↓](#)

#### PURPOSE

To consider a proposed Ministerial Direction, dated 24 June 2021 requiring Council to prepare a Redland City housing supply and diversity strategy by 30 August 2022.

#### BACKGROUND

**2012:** The Redlands Housing Strategy 2011-2031 was finalised as a key background study to inform the planning scheme review and subsequent preparation of the draft Redland City plan.

**2015:** The draft Redland City Plan was placed on statutory public consultation. The draft plan proposed a minimum lot size of 400m<sup>2</sup> in the Low density residential (LDR) zone and 250m<sup>2</sup> in the Low medium density residential (LMDR) zone. Both minimum lot sizes were identified as acceptable outcomes in the Reconfiguring a Lot code.

**2017:** In response to public submissions received during public consultation on the draft City Plan, Council proposed to increase the minimum lot size in the LMDR zone from 250m<sup>2</sup> to 400m<sup>2</sup>. In addition, to provide greater certainty to the community and development industry Council resolved to include references to minimum lots sizes in the LDR and LMDR zone codes in both the overall and performance outcomes as well as the acceptable outcomes.

Following the completion of the submission review process an amended draft City Plan was submitted for Ministerial approval.

**2018:** The City Plan received Ministerial approval (subject to conditions) on 9 June 2018.

The Ministerial conditions required the draft City Plan to be amended to include a qualification to the 400m<sup>2</sup> minimum lot size overall outcome in both the LDR and LMDR zone codes. The qualification required additional wording to be included in the overall outcomes of both zone codes stating lots were not reduced below 400m<sup>2</sup> unless the resultant lots were consistent with the density and character of the surrounding established neighbourhood.

Related to this condition, further advice was provided as part of the Ministerial approval for Council consideration (not required) related to small lot housing as follows:

#### *'Small lot housing*

1. *The proposed changes made to the draft Redland City Plan, in particular-the change to the minimum lot size in the Low-Medium Density Residential zone from 250m<sup>2</sup> to 400m<sup>2</sup>-may result in a reduction in the diversity and amount of small lot housing.*

*The council should undertake additional studies to ensure the Redland City Plan will provide appropriately zoned land to accommodate a diverse range of dwellings, particularly small lot housing.'*

**2019:** The Minister further reiterated this advice in correspondence approving the first major amendment to City Plan. This advice encouraged Council to undertake additional studies to ensure City Plan provided appropriately zoned land to accommodate a diverse range of dwellings, particularly 'small lot housing'. The advice further noted investigations or studies should inform any further City Plan amendments which require consideration against housing supply and diversity.

**2020:** The Planning Department raised, through its pause notice on the South West Victoria Point local plan amendment, that the Minister had advised Council previously to undertake a city wide housing diversity study.

## ISSUES

On 24 June 2021, the Minister for the Department of State Development, Infrastructure, Local Government and Planning (the Minister) wrote to the Chief Executive Officer notifying that he was considering exercising the Ministerial Direction powers under the *Planning Act 2016* (section 26) to require Council to prepare a comprehensive citywide housing supply and diversity strategy (the Strategy) in accordance with an agreed methodology by August 2022. A copy of the Minister's correspondence is attached, refer to Attachment 1.

In accordance with the *Planning Act 2016*, Council may make a submission to the Minister's notification of the proposed Ministerial Direction within 20 business days of the date of the notification (24 June 2021).

The Minister in his correspondence asserts that the Strategy is required to ensure that City Plan appropriately responds to housing challenges by providing appropriately zoned land to accommodate a diverse range of dwellings, with particular emphasis upon delivering opportunities for small lot housing.

The Minister also notes that the accelerated population growth during the COVID-19 pandemic has put South East Queensland's ability to accommodate growth and deliver a sustainable and affordable housing supply under the spotlight. The Minister considers that these changes, brought on by the pandemic, have reinforced the importance for Council to undertake the requested strategy and ensure City Plan can adequately cater for future population growth.

The Minister refers to the 2020 State Land Supply and Development Monitoring report (LSDM report) which shows that the City has a short-term shortfall of residential land supply. The short-term shortfall refers to lot approvals in consolidation and expansion areas overall being below the minimum four years supply identified as a SEQ preferred future in the measures that matters section of the South East Queensland Regional Plan 2017 (ShapingSEQ). The 2020 LSDM report identified that the City has 2.6 years of approved lots. The Minister also expresses there remains an ongoing concern about the ability of City Plan to effectively manage the medium to long-term residential growth requirements of the City.

In summary, the Minister considers that a comprehensive housing supply and diversity strategy is critical, stating:

- Since 2018 repeated requests have been made to Council by the former Planning Ministers and department officers to prepare the study.

- City Plan amendments relating to residential land supply lack an evidence base and may not be reflective of current and forecast needs.
- The known challenges in meeting approved lot supply in consolidation and expansion areas overall, which is already below the four years of supply as identified in Shaping SEQ and the LSDM report.
- The potential compromising of the Council's ability to meet the housing supply requirements under Shaping SEQ could have broader implications at a sub-regional or regional level.
- That Council has not appropriately demonstrated it can meet the current and future needs of the community.
- The accelerated growth prompted by increased interstate migration and the Australian Government's Homebuilder grants during COVID-19 pandemic brought forward many growth challenges in the City and heightened concerns about Council's ability to provide adequate housing choice, diversity and affordability.

In response to the Minister's notification, it is recommended that representations be made to the Minister within the 20 business days provided by the *Planning Act 2016* questioning the need for Council to prepare a housing supply and diversity strategy at this time. Key points to note can be summarised as follows:

1. City Plan was informed by the Redland Housing Strategy 2011-2031 which has provided an evidence based framework to ensure the delivery of appropriate residential supply and housing diversity in City Plan and subsequent ongoing amendments.
2. The State Government's recent 2020 Land Supply Development Monitoring report found that the City has sufficient residential land supply to meet the dwelling benchmarks of the ShapingSEQ, including the minimum 15 year supply and to 2041.
3. It is expected, based on recent lot approval analysis, that the short term shortfall of approved lots in the City will be addressed in the next LSDM report. In particular information recently provided to the newly created Growth Areas Team (GAT) demonstrates that for the 2020/2021 financial year the approved residential lot supply in the City has increased and is expected to exceed the four years of supply as identified in Shaping SEQ and the LSDM report.
4. The LSDM report shows that many of the other SEQ local governments also do not currently meet the minimum four years supply of approved lots, this includes Brisbane, Gold Coast, Moreton Bay, Sunshine Coast and Noosa. It is understood these local governments have not been requested to undertake a housing supply and diversity strategy.
5. Council has progressed land use and infrastructure planning for two newly emerging communities in south west Victoria Point and southern Redland Bay (Shoreline) with reconfiguration approvals already in place. Once completed both master planned areas are expected to accommodate over 5000 newly created lots comprising of a mix of lot sizes including lots below 400m<sup>2</sup> in size.

In regards to southern Redland Bay, the State's recently established GAT has identified the area as a priority growth area. Priority growth areas are newly emerging communities where the GAT will seek to facilitate partnerships between developers, local government, utility providers and the state to support land use and infrastructure planning and infrastructure funding arrangements to accelerate the delivery of land supply in South East Queensland. In this regard, it is noted that the State has recently approved and is facilitating, in partnership

with Lendlease, the staged delivery of a new \$30 million wastewater treatment plant to service development in southern Redland Bay.

In a press release, dated 25 June 2021 the Deputy Premier noted the Southern Redland Bay project 'will unlock growth, housing choice and affordability, as part of Queensland's COVID-19 Economic Recovery Plan'. It is also noted that in addition to the currently approved Shoreline development the Deputy Premier stated 'the infrastructure funding will also unlock an additional 2000 lots outside the master planned community.' It would appear that if successfully progressed by the State, the significant scale of the Southern Redland Bay priority growth area will play a significant role in addressing residential land supply and housing choice and diversity across the whole City further negating any immediate need for Council to progress prepare a Redland City housing supply and diversity strategy.

6. Council has recently engaged independent consultants to undertake a detailed residential land supply study that will inform land use and infrastructure planning. This study will be used to provide an evidence base for the new Local Government Infrastructure Plan.
7. The amendments conditioned by the Minister in approving the City Plan to provide qualifying statements to minimum lots sizes in the Low density residential and Low medium density residential zone provide scope for small lots less than 400m<sup>2</sup>.
8. Major Amendment Package (04/20): Medium density residential zone code review proposes amendments to both the Low medium density and Medium density residential zone code to improve dwelling diversity and facilitate the delivery of freehold titled townhouse development on lots that can be less than 400m<sup>2</sup>. The amendment also seeks to ensure multiple dwelling proposals incorporate a mix of dwelling units with different numbers of bedrooms. These two changes will assist in increasing housing diversity in the City. It should be noted that the Minister has recently approved this major amendment, following state interest review, for public consultation (without conditions) and a separate item addressing the Ministerial approval is included in this General Meeting agenda.
9. The 2020 LSDM report identifies that the City has more than 7 years supply of uncompleted multiple dwellings which is well above the minimum four years supply identified in Shaping SEQ and the LSDM report.
10. A Redland City housing supply and diversity strategy is considered more suitable to be undertaken as part of the next review of City Plan expected to commence in approximately 2025.

Should Council resolve to make representations, the Planning Minister is required by the *Planning Act 2016* to consider the representations in deciding whether or not to make a Ministerial direction.

## **STRATEGIC IMPLICATIONS**

### **Legislative Requirements**

Council is required to respond to the Ministerial notice of intention to make a Ministerial Direction in 20 business day from receipt of the notice on 24 June 2021.

### **Risk Management**

The recommendations of this report will ensure that Council's representations on the proposed Ministerial Direction are considered.

**Financial**

There are no financial issues associated with making representations to the Deputy Premier. If a Ministerial Direction is subsequently issued and Council resolves to comply with the Direction, additional budget allocation will be required. Currently there is no budget allocated in the current financial year to prepare a Redland City housing supply and diversity strategy.

**People**

The staff resources required to make representations to the Minister will be drawn from the Strategic Planning Unit of the City Planning and Assessments Group.

**Environmental**

There are no environmental implications associated with making representations to the Minister.

**Social**

There are no social implications associated with making representations to the Minister.

**Human Rights**

There are no human rights implications associated with making representations to the Minister.

**Alignment with Council's Policy and Plans**

The recommended option aligns with the goals espoused in Council's Corporate Plan: Our Future Redlands – A Corporate Plan to 2026 and Beyond.

**CONSULTATION**

Consulted	Consultation Date	Comments/Actions
Nil	Nil	Nil

**OPTIONS****Option One**

That Council resolves as follows:

1. To note the proposed Ministerial Direction, dated 24 June 2021 requiring Council to prepare a Redland City housing supply and diversity strategy by 30 August 2022.
2. To authorise the Chief Executive Officer to make written representations to the Deputy Premier and Minister for State Development, Infrastructure, Local Government and Planning that there is no demonstrated urgent need to prepare a housing supply and diversity strategy at this time based on the reasons outlined in this report.

**Option Two**

That Council resolves as follows:

1. To note the proposed Ministerial Direction, dated 24 June 2021 requiring Council to prepare a Redland City housing supply and diversity strategy by 30 August 2022.
2. To authorise the Chief Executive Officer to make written representations to the Deputy Premier and Minister for State Development, Infrastructure, Local Government and Planning that there is no demonstrated urgent need to prepare a housing supply and diversity strategy at this time based on the reasons outlined in this report (with additions).



**Option Three**

That Council resolves as follows:

1. To note the proposed Ministerial Direction, dated 24 June 2021 requiring Council to prepare a Redland City housing supply and diversity strategy by 30 August 2022.
2. To not make written representations to the Deputy Premier and Minister for State Development, Infrastructure and Planning.

**OFFICER'S RECOMMENDATION**

That Council resolves as follows:

1. To note the proposed Ministerial Direction, dated 24 June 2021 requiring Council to prepare a Redland City housing supply and diversity strategy by 30 August 2022.
2. To authorise the Chief Executive Officer to make written representations to the Deputy Premier and Minister for State Development, Infrastructure, Local Government and Planning that there is no demonstrated urgent need to prepare a housing supply and diversity strategy at this time based on the reasons outlined in this report.